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6
7 IN THE UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 JIM BASS HOLDEN,
10 Petitioner,

Case No.: 2:14-cv-00894-APG-PAL

MOTION FOR WITHDRAWAL OF
CJA COUNSEL FOR PETITIONER

11 v.

12 STATE OF NEVADA, et al.,
13 Respondents.
_____ /

14 COMES NOW Jeffrey Blanck, appointed CJA counsel ("CJA Counsel") for
15 Petitioner, Jim Bass Holden ("Petitioner"), and hereby moves this Court for an order
16 allowing CJA Counsel to withdraw as Petitioner's counsel. This motion is based upon
17 the following points and authorities and the pleadings on file herein.
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19 Dated: May 11, 2015

20 /s/
JEFFREY S. BLANCK, ESQ.,
Attorney for Petitioner
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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 INTRODUCTION

3 On August 26, 2014, this Court appointed CJA Counsel, JEFFREY S. BLANCK
4 (“CJA Counsel”), to represent Holden in this matter. In its order, the Court advised
5 CJA Counsel of Petitioner’s deadline to file any known claims prior to the expiration of
6 the federal limitation period of October 30, 2014 (Docket #12).

7 1. After his jury trial, Holden was found guilty of: Count I, Burglary While in
8 Possession of a Firearm; Count II, Conspiracy to Commit Murder; Count III,
9 Extortionate Collection of Debt; and Count IV, Murder With use of a Deadly Weapon.

10 2. On June 16, 2006, the clerk of the Eighth Judicial District Court of Clark
11 County, Nevada entered a Judgment of Conviction in the case entitled, State of Nevada
12 vs. Jim Bass Holden #2515224, Case No. 04C200945 (Exhibit 1).

13 3. At Holden’s sentencing hearing, the Court sentenced Holden as follows:
14 Count I, 24-120 months; Count II, 24-120 months and Count II to run concurrent with
15 Count I; Count III, 12-24 months and to run concurrent with Counts I and II; and Count
16 IV, life w/o and an equal and consecutive life w/o which is concurrent with Counts I, II,
17 and III; the sentence in Count IV is to run consecutive to the sentences in Case C202943
18 and Case 214716 (Exhibit 2, pg. 12). Holden is currently serving out his sentence at Ely
19 State Prison.

20 Pursuant to the Court’s Order, CJA Counsel filed Petitioner’s First Amended
21 Petition for Writ of Habeas Corpus, Request for Leave to File a Second Amended
22 Petition and Request for Extension of Time to File a Second Amended Petition, and
23 Motion for Stay and Abeyance on October 29, 2014. On April 13, 2015, the Court
24 granted Petitioner’s Motion for Stay and Abeyance. This matter has been stayed until
25 Petitioner’s state post-conviction matters have been completely exhausted.

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I.

In accordance with Nevada Rules of Professional Conduct 1.17, CJA Counsel is notifying this Court that he has applied for and has accepted a position as legal counsel for a public entity in another state and is closing his law practice in Nevada effective May 31, 2015.

CONCLUSION

Dated: May 11, 2015

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that on the 11th day of May 2015, I am an employee of the LAW OFFICE OF JEFFREY S. BLANCK, and that on this day, I caused to be served a true and correct copy of the **MOTION FOR WITHDRAWAL OF CJA COUNSEL FOR PETITIONER** by:

- ☐ U.S. Mail
- ☐ Facsimile Transmission
- ☐ Personal Service
- ☐ Hand Delivery
- ☐ Messenger Service
- ☒ CM/ECF Electronic Service
- ☐ Electronic Mail

addressed to the following:

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/s
GALE SANDERS